

STATEMENT OF BASIS (AI No. 43249)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0123307 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Slidell Welding Service Inc.
PO Box 1537
Pearl River, LA 70452-1537

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Maxon Graham

DATE PREPARED: 26 October 2007

1. PERMIT STATUS

A. Reason For Permit Action: Permit revocation and reissuance of a current Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits - LPDES permit effective date: LAG530660 – March 31, 1998;
LAR05N885 – September 6, 2007
LPDES permit expiration date: LAG530660 – November 30, 2007
LAR05N885 – April 30, 2011

D. Date Application Received: 22 October 2007

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - steel fabrication facility

This is a steel fabrication facility, which assembles crane components. The company receives the parts for the crane and assembles them. The company welds the parts, it does not fabricate the pieces themselves. The pieces are then cleaned and sent out of the facility. Smaller fabrication processes occur, but the major production at this facility is the crane components.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 3446, 3499

C. LOCATION - 38123 Highway Department Rd, Pearl River, St Tammany Parish
Latitude 30 20' 49", Longitude 89 45' 51"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated sanitary wastewater
Treatment: chlorination
Location: at the front right corner of the facility
Flow: < 500 gpd (estimated flow is 300 gpd)
Discharge Route: local drainage to W15 canal thence into Doubloon Bayou thence to Fritchie Marsh

Outfall 002

Discharge Type: treated sanitary wastewater
Treatment: chlorination
Location: at the front left corner of the facility
Flow: < 500 gpd (estimated flow is 100 gpd)
Discharge Route: local drainage to W15 canal thence into Doubloon Bayou thence to Fritchie Marsh

4. RECEIVING WATERS

STREAM - local drainage to W15 canal thence into Doubloon Bayou thence to Fritchie Marsh

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040907

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife

* **BASIN AND SEGMENT** - The discharge is into a roadside ditch, which is physically located in subsegment 090202 of the Pearl River Basin, defined at LAC 33:IX.1123. Table 3 as West Pearl River – from Holmes Bayou to The Rigolets: includes east and west mouths (Scenic). However, based on the discharge route provided by the facility, the discharge from Slidell Welding Service Inc. does not flow into this defined waterbody, rather into subsegment 040907, defined at LAC 33:IX.1123. Table 3 as Bayou Bonfouca – From headwaters to LA 433. Therefore, for purposes of issuing this permit, subsegment 040907 will be used in the development of requirements.

5. TMDL STATUS

Subsegment 040907, Bayou Bonfouca – from headwaters to LA 433, is listed on LDEQ's Final 2004 303(d) List as impaired for organic enrichment/low DO, Chlorides, and Sulfates. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the steel fabrication facility point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Chlorides and sulfates are listed as drought-related impacts. A BOD₅ limitation placed on the sanitary discharge will address dissolved oxygen concerns.

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6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

CHANGES -

Outfall 001 - will have quarterly monitoring rather than once per year

Outfall 002 - will be added to the facility outfalls and will be monitored quarterly

Stormwater - SWP3 will be a part of the facility requirements for this permit. This will cover stormwater discharges from the facility and will replace the Multi-Sector General Permit (LAR05N885) which the facility is covered under now.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

1. WQMD: The company was issued a consolidated compliance order and notice of potential penalty; WE-CN-01-0539 on April 5, 2002 based on an inspection around May 23, 2001 and subsequent file review for this facility due to noncompliance with LAG530660. Specifically, there was no record of sampling, monitoring or submitting Discharge Monitoring Reports as required by the permit LAG530660.

B. DMR Review: A DMR review was conducted for the period January 1, 2001 through December 31, 2006. The following excursions were reported.

Date	Parameter	Outfall	Reported Value	Permit Limits
01-01-01 to 12-31-01	Fecal Coliform	001	> 60,000 colonies /100 mL	400 colonies / 100 mL
01-01-01 to 12-31-01	BOD	001	126 mg/L	45 mg/L
01-01-02 - 12-31-02	TSS	001	52 mg/L	45 mg/L
01-01-03 - 12-31-03	BOD	001	96 mg/L	45 mg/L
01-01-03 - 12-31-03	TSS	001	144 mg/L	45 mg/L
01-01-03 - 12-31-03	Fecal Coliform	001	> 60,000 colonies /100 mL	400 colonies / 100 mL
01-01-04 - 12-31-04	TSS	001	56 mg/L	45 mg/L
01-01-04 - 12-31-04	Fecal Coliform	001	> 60,000 colonies /100 mL	400 colonies / 100 mL

- the facility sent in a letter dated August 16, 2002 stating that the treatment system for Outfall 001 had been cleaned and maintenance performed. The monitoring for the facility has been within limits for the period after this maintenance was performed. The facility has added a second outfall and requested modification of the LAG530000 Class I Sanitary General permit for the facility. Based on the previous compliance history and the enforcement action it was deemed necessary for more frequent monitoring of the

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discharges from this facility. In order to do this a letter was sent requesting the SCC-2 application be filled out.

- a letter dated September 10, 2007 requesting that permit LAG530660 be modified and Outfall 002 be added was received on September 17, 2007. This office received the application for an individual minor industrial permit on October 22, 2007.

C. Inspections: There is one inspection on file as of August 14, 2007. The following violations were noted during the inspection on May 23, 2001:

1. no effluent sampling has been conducted
2. failure to submit DMR's or maintain copies on site as required by the permit.

8. EXISTING EFFLUENT LIMITS –

Outfall 001

Parameter	Limitation	
	Monthly Average	Weekly Average
BOD ₅	---	45 mg/L
Fecal Coliform Colonies / 100 mL	---	400
Flow	---	Report
TSS	---	45 mg/L
pH – Allowable Range (su)	6.0 (min)	9.0 (max)

Monitoring Frequency: annually at the point of discharge from the sewage treatment plant prior to mixing with waters of the state.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040907 of the Lake Pontchartrain Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

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11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Slidell Welding Service Inc.

1. **Outfall 001, 002** – Treated sanitary wastewater (estimated flow - 300 gpd from 001; 100 gpd from 002)

Parameter	Limitation		Reference
	Monthly Average	Weekly Average	
BOD ₅	---	45 mg/L	BPJ; similar discharges
Fecal Coliform Colonies/100 mL	---	400	BPJ; similar discharges
Flow	---	Report	BPJ; similar discharges
TSS	---	45 mg/L	BPJ; similar discharges
pH – Allowable Range (su)	6.0 (min)	9.0 (max)	BPJ; similar discharges

Treatment: mechanical treatment plant with aeration and clarification

Monitoring Frequency: quarterly at the point of discharge from the sewage treatment plant prior to mixing with waters of the state.

Limits Justification: limits and monitoring frequencies are based on BPJ and current guidance for similar discharges from other industrial facilities; increased monitoring frequency due to previous compliance history

BPJ Best Professional Judgment
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 3499 and 3446 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).